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December 1, 2005

Via Electronic Filing

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street SW Washington, DC 20554

Re:

Telecommunication Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities – CG Docket No. 03-123 Ex Parte Notice

Dear Ms. Dortch:

On November 30, 2005, Dave Johnson, Mike Maddix, John Edington, Skip Clavell, Barry Utley and Pat Nola of Sorenson Communications, Inc. ("Sorenson"); A. Richard Metzger, Jr. and the undersigned of Lawler, Metzger, Milkman & Keeney, LLC, counsel to Sorenson; and Beth Graham and Mark Morris of Gallaudet Interpreting Service met with Monica Desai, Jay Keithley and Thomas Chandler of the Federal Communications Commission. Issues related to video relay services were discussed at the meeting, as reflected in the attached presentation.

Pursuant to the Commission's rules, this letter and the attached presentation are being submitted for inclusion of the public record in the above-referenced proceeding.

Sincerely,

/s/ Ruth Milkman
Ruth Milkman

Attachment

cc:

Monica Desai Jay Keithley Thomas Chandler

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Getting to 100% in 2010: High Quality VRS Access

November 30, 2005

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Goals for VRS

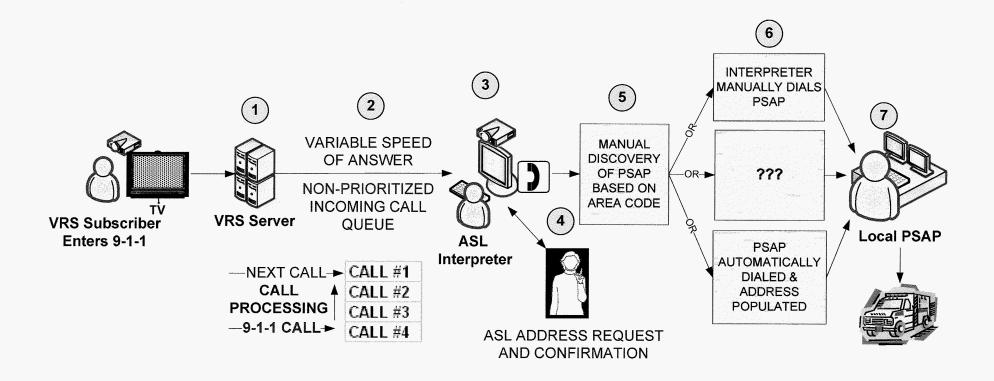
- Deaf community needs:
 - Everyone on VRS: 100% accessibility in 2010; currently less than 10% penetration
 - High-quality and rapid availability of video connection through interpreters to deaf and hearing communicators
 - Immediate access to emergency communications
 - Competition in providing VRS to expand penetration and improve quality
 - Customer choice for total service

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E911: Sorenson Solution

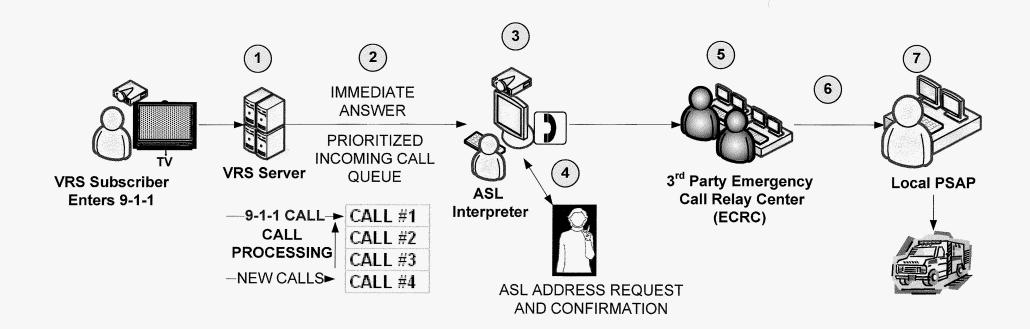
- By year-end 2005, Sorenson intends to provide most rapid E911 connection of any VRS provider
 - Immediate answer
 - E911 call first in queue
- Sorenson intends to provide best quality solution for any 911 situation
- Sorenson is committed to ongoing improvements for emergency communications for deaf community
- 911 calls to unprepared VRS providers can lead to life-threatening consequences

Current VRS Provider 911 Capabilities



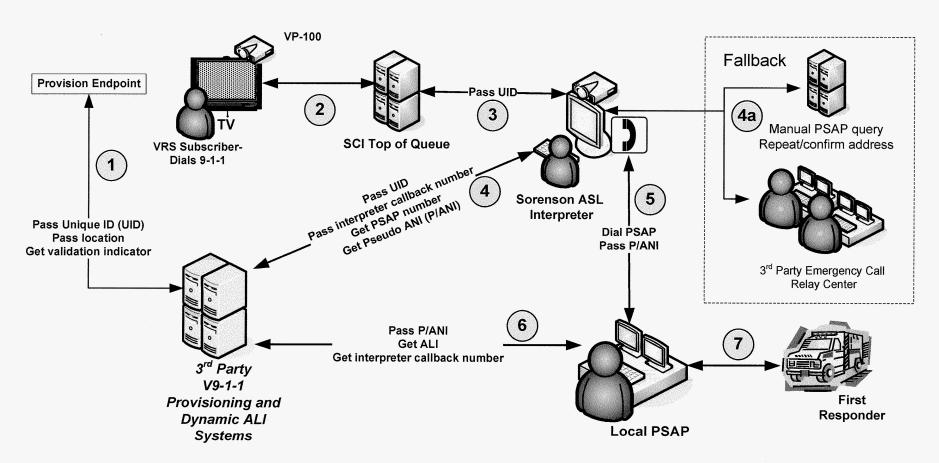
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VRS 911 Priority and 3rd Party PSAP



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Fully Integrated VRS 911



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Customer Choice Without Unnecessary Regulation

- Modern FCC does not manage details of service provision or dictate hardware or software solutions
- For deaf community, competition should drive providers to offer comprehensive service, including best image quality and trained interpreters
- Sorenson has most "functionally equivalent" service today
 - Deaf telephone network
 - Point-to-point calls account for over 80% of calls
 - Highest quality

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Customer Choice Today

- Today, VRS customers have choice, consistent with the Act and FCC precedent
 - Customer can choose one or more of 8 VRS providers traditional TTY customers have no choice
 - Any hearing individual can contact a Sorenson user through any VRS provider
 - Deaf-to-deaf calls without limitation
- Typically, FCC policies facilitate total service, which can include customer equipment
 - Push-to-Talk
 - DBS
 - Wireless Phones
 - Instant Messaging
 - Cable and DSL: broadband plus enhanced capabilities

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Customer Choice and Innovation

- VRS providers need to work together to ensure safety and high quality
- VRS providers should compete on service quality, including picture quality, speed of response, and interpreter skills
- Where useful, VRS providers can agree to share interpreting availability on a reciprocal basis, pursuant to negotiated agreements
- VRS providers should compete to offer the total service of connecting to the hearing world, not to deter individual providers from offering innovative technologies and applications
- Innovation driven by desire to serve more customers, not by dollar-for-dollar reimbursement of R&D
- FCC has avoided regulating hardware and software in order to promote total service competition

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Conclusion

- Success equals
 - 100% penetration of deaf users by 2010
- Success requires
 - E911 access
 - Competition in innovation
 - Total service solution
 - Customer choice of installed provider, not choice per call
 - Cooperative industry agreements, not regulation of hardware and software